

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

-----X  
CAROLYN GREENE, on Behalf of Herself and :  
All Others Similarly Situated, :  
Plaintiff, : Civ. No. 1:03 CV 12628 (NG)  
vs. :  
BIOPURE CORPORATION, THOMAS A. MOORE, :  
CARL W. RAUSCH and RONALD F. RICHARDS, :  
Defendants. :  
-----X

[Additional Captions Set Forth Below]

**NOTICE OF APPEARANCE OF THEODORE M. HESS-MAHAN**

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:  
JOHN G. ESPOSITO, JR., on Behalf of Himself and  
All Others Similarly Situated,  
:  
Plaintiff, : Civ. No. 1:04 CV 10013 (NG)  
:  
vs. :  
:  
BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,  
:  
Defendants.  
-----X  
:  
JOSEPH L. KING, on Behalf of Himself and  
All Others Similarly Situated,  
:  
Plaintiff, : Civ. No. 1:04 CV 10038 (NG)  
:  
vs. :  
:  
BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,  
:  
Defendants.  
-----X  
:  
MICHAEL E. CRIDEN, Individually and on Behalf  
of All Others Similarly Situated,  
:  
Plaintiff, : Civ. No. 1:04 CV 10046 (NG)  
:  
vs. :  
:  
BIOPURE CORPORATION, THOMAS A. MOORE  
and CARL W. RAUSCH,  
:  
Defendants.  
-----X

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ISRAEL SHURKIN and SHARON SHURKIN, :  
Individually and on Behalf of All Others :  
Similarly Situated, :  
: Plaintiffs, : Civ. No. 1:04 CV 10055 (NG)  
: vs. :  
: BIOPURE CORPORATION, THOMAS A. MOORE :  
and CARL W. RAUSCH, :  
: Defendants. :  
-----X  
JAMES J. NIZZO, VIRGINIA C. NIZZO and :  
CARLO CILIBERTI, on Behalf of Themselves :  
and All Others Similarly Situated, :  
: Plaintiffs, : Civ. No. 1:04 CV 10065 (NG)  
: vs. :  
: BIOPURE CORPORATION, THOMAS A. MOORE, :  
CARL W. RAUSCH and RONALD F. RICHARDS, :  
: Defendants. :  
-----X  
BARRY BROOKS, on Behalf of Himself and :  
All Others Similarly Situated, :  
: Plaintiff, : Civ. No. 1:04 CV 10077 (NG)  
: vs. :  
: BIOPURE CORPORATION, THOMAS A. MOORE, :  
CARL W. RAUSCH and RONALD F. RICHARDS, :  
: Defendants. :  
-----X

-----X  
ANASTASIOS PERLEGIS, Individually and on :  
Behalf of All Others Similarly Situated, :  
: Plaintiff, : Civ. No. 1:04 CV 10078 (NG)  
: :  
vs. :  
: :  
BIOPURE CORPORATION, THOMAS A. MOORE, :  
THOMAS A. MOORE, CARL W. RAUSCH and :  
RONALD F. RICHARDS, :  
: Defendants. :  
-----X  
MARTIN WEBER, on Behalf of Himself and All :  
Others Similarly Situated, :  
: :  
Plaintiffs, : Civ. No. 1:04 CV 10090 (NG)  
: :  
vs. :  
: :  
BIOPURE CORPORATION, THOMAS A. MOORE, :  
THOMAS A. MOORE, CARL W. RAUSCH and :  
RONALD F. RICHARDS, :  
: Defendants. :  
-----X  
BRUCE HAIMS, Individually and on Behalf of :  
All Others Similarly Situated, :  
: :  
Plaintiffs, : Civ. No. 1:04 CV 10144 (NG)  
: :  
vs. :  
: :  
BIOPURE CORPORATION, THOMAS A. MOORE, :  
THOMAS A. MOORE, CARL W. RAUSCH and :  
RONALD F. RICHARDS, :  
: Defendants. :  
-----X

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MODEL PARTNERS LIMITED, Individually and :  
on Behalf of All Others Similarly Situated, :  
: Plaintiff, : Civ. No. 1:04 CV 10155 (NG)  
: :  
vs. :  
: :  
BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH and RONALD :  
F. RICHARDS, :  
: Defendants. :  
-----X  
JUNE E. PATENAUDE, Individually and on Behalf :  
of All Others Similarly Situated, :  
: Plaintiff, : Civ. No. 1:04 CV 10179 (NG)  
: :  
vs. :  
: :  
BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH and RONALD :  
F. RICHARDS, :  
: Defendants. :  
-----X  
NANCY L. PINCKNEY, and GERTRUDE :  
PINCKNEY, Individually and on Behalf of All :  
Others Similarly Situated, :  
: Plaintiff, : Civ. No. 1:04 CV 10189 (NG)  
: :  
vs. :  
: :  
BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH, :  
: Defendants. :  
-----X

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W. KENNETH JOHNSON, on Behalf of Himself :  
and All Others Similarly Situated, :  
: Plaintiff, : Civ. No. 1:04 CV 10190 (NG)  
: vs. :  
: BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH and RONALD :  
F. RICHARDS, :  
: Defendants. :  
-----X  
GREGORY KRUSZKA, on Behalf of Himself :  
and All Others Similarly Situated, :  
: Plaintiff, : Civ. No. 1:04 CV 10202 (NG)  
: BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH and RONALD :  
F. RICHARDS, :  
: Defendants. :  
-----X

**NOTICE OF APPEARANCE OF THEODORE M. HESS-MAHAN**

PLEASE TAKE NOTICE THAT Theodore M. Hess-Mahan hereby enters his appearance  
on behalf of the Proposed Lead Plaintiff Ronald Erickson in the above-captioned actions.

Dated: May 14, 2004

Respectfully submitted,

**SHAPIRO HABER & URMY LLP**

**/s/Theodore M. Hess-Mahan**

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**Proposed Co-Lead Counsel For  
Plaintiff and The Class**